



SOUTH COAST AIR QUALITY MANAGEMENT

**ENGINEERING AND COMPLIANCE DIVISION
COATING, PRINTING AND AEROSPACE OPERATIONS TEAM
PERMIT APPLICATION EVALUATION**

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A/N 485214,15,18 & 19	Date 12/11/09
Processed by WW	Checked by SMKE

PERMIT TO OPERATE Change of Conditions – Spray Booths

APPLICANT:	Ducommun Aerostructures, Inc.
FACILITY ID:	140811
EQUIPMENT LOCATION	801 Royal Oaks Drive, Monrovia, CA 91016
MAILING ADDRESS :	801 Royal Oaks Drive, Monrovia, CA 91016

EQUIPMENT DESCRIPTION

A/N 485214

Administrative change of condition to A/N 437284, PO# F77118 to operate the following:

SPRAY BOOTH NO. 3037, BLEEKER, FLOOR TYPE, 16'-0" W. X 12'-0" L. X 8'-0" H., WITH THIRTY-SIX 20" X 20" PRIMARY EXHAUST FILTERS, THIRTY-SIX 20" X 20" SECONDARY FILTERS, TWELVE 24" X 24" X 12" HEPA EXHAUST FILTERS AND ONE 10 H.P. EXHAUST BLOWER.

To add a Rule 1469.1 condition.

A/N 485215

Administrative change of condition to A/N 430394, PO# F71746 to operate the following:

SPRAY BOOTH NO. 3038, CIRCLE INDUSTRIAL, FLOOR TYPE, 25'-0" W. X 12'-0" L. X 7'-0" H., WITH FIFTY-TWO 20" X 20" PRIMARY EXHAUST FILTERS, FIFTY-TWO 20" X 20" SECONDARY FILTERS, EIGHTEEN 24" X 24" X 12" HEPA EXHAUST FILTERS AND TWO 7.5 H.P. EXHAUST BLOWERS.

To add a Rule 1469.1 condition.

A/N 485218

Administrative change of condition to A/N 437283, PO# F77117 to operate the following:

SPRAY BOOTH NO. 3026, CIRCLE INDUSTRIAL MFG., FLOOR TYPE, 33'-0" W. X 45'-0" L. X 10'-0" H., WITH NINETY-SIX 20" X 20" EXHAUST PREFILTERS, TWENTY 24" X 24" PRIMARY FILTERS, TWENTY 24" X 24" X 12" SECONDARY FILTERS, TWENTY 24" X 24" X 12" HEPA EXHAUST FILTERS AND ONE 50 H.P. EXHAUST BLOWER.

To add a Rule 1469.1 condition.



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A/N 485219

Administrative change of condition to A/N 430392, PO# F71744 to operate the following:

SPRAY BOOTH NO. 3036, BLEEKER, FLOOR TYPE, MODEL F-20-8, 20'-0" W. X 12'-0" L. X 8'-0" H., WITH FORTY-FOUR 20" X 20" PRIMARY EXHAUST FILTERS, FORTY-FOUR 20" X 20" SECONDARY FILTERS, FOURTEEN 24" X 24" X 12" HEPA EXHAUST FILTERS AND ONE 10 H.P. EXHAUST BLOWER.

To add a Rule 1469.1 condition.

A/N 493017 – Title V Permit Revision

Deminimis Significant Permit Revision

BACKGROUND

Ducommun Aerostructures Inc. (DAI) is an aerospace contractor whose primary operations involve the manufacture and coating of aerospace components. Applications nos. 485214 & 15, 485218 & 19 were submitted 11/14/08 for administrative change of condition to include enforceable Rule 1469.1 conditions. These four spray booths are used to spray coat helicopter blades. The coatings used contain strontium chromate which contains hexavalent chromium and is a carcinogenic compound under Rule 1401. The spray booths already have HEPA filters which are DOP tested with 0.3 microns particles and certified to have a control efficiency of not less than 99.97% as required by Rule 1469.1. A condition will be added to require continued use of these HEPA filters with 99.97% DOP tested filters on these booths that are allowed to use hexavalent chromium containing coatings.

DAI received a four notices to comply to submit certain records or applications. All N/Cs are closed. They also received two notices of violation, both of which are closed. DAI is a Title V facility. A Title V permit renewal was issued to this facility on July 28, 2008. This proposed project is the 1st permit revision to the Title V permit renewal.

EMISSION CALCULATION:

All emission data in each previous permit application will be transferred. The proposed change will not result in any facility emission increase.

Operating schedule: 24 hrs/day, 7 days/wk, 52 wks/yr (max)



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A/N	Booth	NSR 30-day ave		Equip VOC Cap
		ROG	PM ₁₀	
485214	3037	27	2	No limit
485215	3038	288	0	26
485218	3026	0	0	No limit
485219	3036	26	0	61

RULE EVALUATION:

REG II, IV, XI, XIII, AND XIV

The proposed administrative change for the above equipment will not result in any increase in emissions. Compliance with all applicable rules in Regulations II, IV, XI, XIII, and XIV is expected. No NSR or 1401 trigger since there is no emissions increase from this change. No nuisance or visible emission complaints are on file for the last two years.

Rule 1469.1 – These four booths are allowed to use coatings containing hexavalent chromium. A permit condition will be added to the above four spray booths to ensure continued compliance with this rule. The other booths at the facility are not allowed to use materials containing hexavalent chromium or already have a similar condition.

The HEPA filters used in this equipment shall be individually DOP tested (or equivalent) with 0.3 micron particles and certified to have a control efficiency of not less than 99.97%.

[Rule 1469.1]

REGULATION XXX

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).



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This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on July 28, 2008. Also included with this revision is the addition of a gas-fired oven under A/N 485212 which has been evaluated separately; the revision to add the oven is a de minimis significant revision to the Title V renewal permit. The following table summarizes the permit revisions since the Title V renewal permit was issued:

Revision		HAP	VOC	NOx	PM₁₀	SOx	CO
1st Permit Revision	Change of conditions for four spray booths 485214 & 15, 485218 & 19 (minor)	0	0	0	0	0	0
	Add oven A/N 485212 (de minimis significant)	0	0	1	0	0	0
Cumulative Total		0	0	1	0	0	0
Maximum Daily		30	30	40	30	60	220

RECOMMENDATION:

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision” plus the “de minimis significant” permit revision to add the oven, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections and there are no public comments within the review period, a revised Title V permit will be issued to this facility, with permits to operate issued for the four spray booths with revised conditions and an oven.